

EVERETT CITY COUNCIL AGENDA ITEM COVER SHEET

PROJECT TITLE:

Agreement with the Boeing
Company and the
City for the Direct Count
Program

_____ Briefing
_____ Proposed Action
_____ Consent
_____ X Action
_____ First Reading
_____ Second Reading
_____ Third Reading
_____ Public Hearing
_____ Budget Advisory

COUNCIL BILL # _____
Originating Department _____
Contact Person _____
Phone Number _____
FOR AGENDA OF _____

_____ Ryan Sass
_____ 425.257-8942
_____ February 27, 2019

Initialed by:
Department Head _____
Administration _____
Council President B

<u>Location</u>	<u>Preceding Action</u>	<u>Attachments</u>	<u>Department(s) Approval</u>
Boeing Everett Site		Program Agreement SEPA Decision Addendum	Public Works, Planning, Legal

Amount Budgeted	-0-	
Expenditure Required	-0-	Account Number(s):
Budget Remaining	-0-	
Additional Required	-0-	

DETAILED SUMMARY STATEMENT:

Traffic impact analysis studies typically rely on trip generation data sets obtained from multiple previous studies of similar facilities. The Boeing facility in Everett, as a unique world-class manufacturing and engineering facility, does not fit available data sets for trip generation estimates. The deployment of real time trip counting technology enables us to determine actual trip generation on a continuous basis.

The Boeing Company and the City acknowledge the need for an updated system to pay for actual traffic impacts as the Boeing Facility changes and grows. Implementation of the Direct Count Program will better track and mitigate for actual increases in trip generation exceeding the amount for which Boeing has already paid mitigation for. It is anticipated that this system will provide for a more effective means for Boeing and the City to manage and mitigate traffic impacts while allowing for employment growth rather than the current system based on limiting numbers of employees and parking stalls.

RECOMMENDATION (Exact action requested of Council):

Authorize the Mayor to sign the Agreement with the Boeing Company for the Direct Count Program

Direct Count Program Agreement

THIS AGREEMENT is entered into this _____ day of _____, 2018, by and between THE BOEING COMPANY (hereinafter referred to as the "Applicant"), and the CITY OF EVERETT, a municipal corporation under the laws of the State of Washington (hereinafter referred to as the "City").

WITNESSETH:

WHEREAS, the City and Applicant agree to follow a direct count traffic monitoring system to continuously measure the inbound and outbound vehicle trips at all of the main Boeing Everett site access driveways.

WHEREAS, the direct count traffic monitoring system is to accurately identify the Boeing PM peak hour and measure Boeing peak hour traffic volumes through trip counts to determine compliance with the 1991 Boeing Expansion FEIS.

WHEREAS, the data would then be compared with the baseline peak hour trips as identified and mitigated for in the 1991 Boeing Expansion FEIS or subsequent baselines as provided for in this Agreement.

WHEREAS, Boeing has already mitigated for 12,315 baseline PM peak hour trips as a part of the 1991 Boeing Expansion EIS. If PM peak hour trip counts increase above the current baseline of 12,315, Boeing would then mitigate for any additional PM peak hour trips above this current baseline. Thereafter, the new trip count would become the new baseline and Boeing would continue to mitigate for trips over the baseline in effect on an annual basis.

WHEREAS, as a result of the direct count traffic monitoring system, the City of Everett will eliminate the parking and employee cap placed on the main Boeing Everett site pursuant to the 1991 Boeing Expansion EIS.

NOW, THEREFORE, the City and the Applicant mutually agree as follows:

- 1) **PURPOSE.** The purpose of this Agreement is to, consistent with Proposed Addendum No. 19 to the 1991 Boeing Everett Mitigation Decision Document, SEPA #17-009 or a substantially similar final Addendum No. 19 to the 1991 Boeing Everett Mitigation Decision Document, SEPA #17-009 (either document is the "Decision Document"), authorize and provide for a direct count monitoring system (the "Direct Count System") at Applicant's main Everett site. Further, this Agreement establishes Applicant reporting requirements for the purpose of determining compliance with the Decision Document. The Decision Document is Exhibit A to this Agreement and is, by reference, incorporated herein in its entirety.
- 2) **SITE.** 3003 W. Casino Road, Everett, Washington 98204.

- 3) **TERM.** This agreement will remain in full force and effect so long as the Decision Document remains the decision governing traffic mitigation requirements at this location, or unless the City terminates this Agreement pursuant to Section Four below. If at any time the City issues a subsequent and superseding decision to the Decision Document that is inconsistent with the intent and purpose of this Agreement, this Agreement will terminate upon the City providing 10 days written notice to Applicant.
- 4) **TERMINATION.** The City has the option to terminate this Agreement at its sole discretion. In order to exercise this termination option, the City shall deliver written notice of termination to Applicant. Except for a termination as provided under Section Three above, this Agreement then terminates on the date that is ninety (90) days after the date of delivery of the termination notice, unless the termination notice states a later termination date, in which case this Agreement terminates on such later date. For any termination occurring within the first twenty-four (24) months after Applicant's purchase of the Direct Count System as described in Section Five below, the termination date shall be no earlier than six (6) months from the date of delivery of the termination notice. The termination of this Agreement in no way affects the Decision Document, which remains in full force and effect and subject to its own terms. In the event the City terminates this Agreement, it remains Applicant's sole responsibility to comply with the Decision Document.
- 5) **DIRECT COUNT TRAFFIC MONITORING SYSTEM.**
- a. Applicant is responsible for the purchase, installation, maintenance, and operation, all at its sole cost, of the Direct Count System approved by the City and consistent with the terms of this Agreement and the Decision Document.
 - b. Applicant will provide 120 VAC power for Direct Count System equipment at eight driveway locations, or as mutually agreed to in writing with the City. The eight driveway locations are identified in Exhibit B, which, by reference, is incorporated herein in its entirety.
 - c. Applicant will purchase from the City any and all Direct Count System equipment necessary to fulfill the purpose of this Agreement and the Decision Document. With prior written approval from the City, Applicant may purchase Direct Count System from a non-City vendor. Any and all Direct Count System equipment purchased from the City is purchased AS IS with all express and implied warranties disclaimed. The Direct Count System equipment includes, without limitation, monitoring equipment, cellular equipment, and associated hardware and software. Solely for illustrative purposes, the estimated procurement and installation of the Direct Count System is one hundred and ten thousand dollars (\$110,000). See Exhibit C, a copy of the procurement and installation estimate. Actual costs may exceed this estimate.
 - d. Applicant must maintain the Direct Count System in good working order for the duration of this Agreement. Applicant will make any and all necessary repairs within 72 hours of learning that the Direct Count System is not in good working order, or within such time as is reasonable given the severity of the repairs needed.

- e. Applicant may contract with the City for the installation, repair, or maintenance of any part of the Direct Count System. City, in its sole discretion, may provide the aforementioned services. Any and all services provided by the City are at the Applicant's sole cost. City will invoice Applicant for such costs.
- f. Applicant must pay all invoices received for services rendered pursuant to this Agreement within thirty (30) days of the date of the invoice. Services rendered includes, without limitation, invoices issued for Applicant's purchase of Direct Count System equipment.

6) DATA COLLECTION.

- a. Applicant will transmit traffic volume data recorded by the Direct Count System electronically to a City server at least once per week. Applicant will be solely responsible for transmitting the traffic volume data in a timely manner. The Applicant may contract with the City to provide this service. The City, in its sole discretion, may choose or decline to provide such service. The City will invoice Applicant for any and all costs incurred by the City to transmit or receive transmittal of the traffic volume data. Traffic volume data is the tabulation of the inbound and outbound vehicle trips at all of the main Boeing Everett site access driveways.
- b. The City will generally collect traffic volume data on a weekly basis. At Applicant's request, the City will provide weekly traffic reports as shown in Figures 12 and 14 of the Methodology Document. Exhibit D is the Methodology Document, which, by reference, is incorporated herein in its entirety.
- c. The City and Applicant will review the traffic volume data periodically. Any data determined by the City to be inaccurate will be excluded from reporting requirements.

7) REPORTING. Applicant will provide the City a written report by March 1st of each year. The City may, in its sole discretion, require certain data or other information necessary to determine compliance with the Decision Document be included in the report. After the first reporting year, the annual reporting cycle will be normalized to a calendar year ending on December 31st.

8) TRAFFIC MITIGATION FEES. At the end of each reporting cycle, the City will review Applicant's report. If the City determines, based on its review of the report, that PM peak trips generated at the Site exceed the baseline trips already mitigated for, then Applicant will pay an additional traffic mitigation fee in accordance with chapter 18.40 of the Everett Municipal Code (Ordinance No. 3387-14 as amended) as it is in effect at the time of the City's determination. If there is a subarea plan in effect at this Site at the time of the City's determination, such subarea plan will govern the traffic mitigation fee. The baseline will then be adjusted to reflect the volume increase mitigated through fee payment for future reporting periods. Each new baseline will be tracked by the Applicant and the City.

9) MISCELLANEOUS PROVISIONS.

- a. Complete Agreement. This Agreement constitutes the entire agreement of the parties relating to the subject matter of this Agreement. This Agreement supersedes and replaces all other written or oral agreements thereto.
- b. Governing Law. The laws of the State of Washington, without giving effect to principles of conflict of laws, govern all matters arising out of or relating to this Agreement.
- c. Venue. The parties shall bring any litigation arising out of or relating to this Agreement only before the Snohomish County Superior Court.
- d. Amendment. No amendment to this Agreement will be effective unless it is in writing and signed by the parties.
- e. Waiver. No waiver of satisfaction of any condition or nonperformance of an obligation under this Agreement will be effective unless it is in writing and signed by the party granting the waiver, and no such waiver will constitute a waiver of satisfaction of any other condition or nonperformance of any other obligation.
- f. Severability. If any provision of this Agreement is unenforceable to any extent, the remainder of this Agreement (or the application of that provision to any persons or circumstances other than those as to which it is held unenforceable) will not be affected by that unenforceability and will be enforceable to fullest extent permitted by law.
- g. Notice. For a notice under this Agreement to be valid, it must be in writing and the sending party must use one of the following methods of delivery: (A) personal delivery to the address stated below; (B) first class postage prepaid U.S. Mail to the address stated below; or (C) nationally recognized courier to the address stated below, with all fees prepaid. Either party may change its notice address or email effective on written notice to the other party of the change.

Notice to City	Notice to Applicant
TRAFFIC ENGINEER PLANNING DIRECTOR City of Everett 3200 Cedar Street Everett, WA 98201	The Boeing Company c/o MBG Consulting, Inc. Boeing Lease Administration Team 980 N. Michigan Avenue, Suite 1000 Chicago, IL 60611-4521 copy to: Everett Site Services Director The Boeing Company P.O. Box 3707, M/S OH-13 Seattle, WA 98124-2207

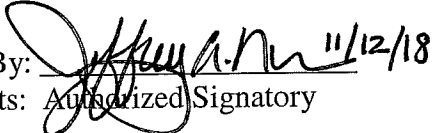
- h. Assignment. Neither party may assign or sublet this Agreement without the written consent of the other party, which consent may be withheld at that party's sole discretion.
- i. Successors. This Agreement shall be binding upon the parties and their respective successors and assigns.
- j. Rights and Remedies. The rights and remedies provided in this Agreement are in addition to any other rights and remedies that may be provided by law. Only the City or Applicant may enforce this Agreement.

IN WITNESS WHEREOF the parties hereto have executed this Agreement as of the day and year first above written.

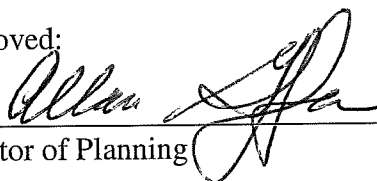
CITY OF EVERETT

By: _____
Its: Mayor


THE BOEING COMPANY

By: 
Its: Authorized Signatory

Approved:


Director of Planning

Approved:


Director of Public Works

Attest:

City Clerk

Approved as to form:

City Attorney

EXHIBIT A



**PROPOSED
ADDENDUM NO. 19 TO THE
1991 BOEING EVERETT MITIGATION
DECISION DOCUMENT
SEPA #17-009**

November 17, 2017

APPLICANT: The Boeing Company
Attn: Pete McGuire
P.O. Box 3707
MS: OH-13
Seattle, WA 98124-2207

PROJECT LOCATION: 3003 W Casino Rd.
Everett, WA 98204

Lead Agency: City of Everett Planning Department

Contact Person: Teresa Weldon Phone: (425) 257-8731

DESCRIPTION OF THE PROPOSED ACTION:

The proposed action is an amendment to the Decision Document to eliminate the cap of 21,000 on-site parking stalls and the cap of 35,000 employees at the Everett Boeing main site in exchange for the implementation of a direct vehicle traffic counting system called the "Direct Count Program". The City of Everett and Boeing will jointly participate in this program to provide direct counting of vehicle traffic at all entrances to Everett Boeing's Main Site and Flightline.

The data generated will be compared with baseline data from the 1991 Master Plan EIS to evaluate actual trip generation. To date, Boeing has paid for 12,315 PM Hour Peak Trips. For each new PM Peak Hour Trip above the approved baseline traffic volume, Boeing shall pay a traffic mitigation fee calculated in accordance with the traffic mitigation ordinance in effect for the Boeing Everett site at the time of calculation. Upon payment of this traffic mitigation fee, a new baseline traffic volume shall be set equal to the sum of the old baseline traffic volume and the newly mitigation PM Peak Hour Trips. By implementation of this program, the future observed annual traffic counts will be the determining factor in whether traffic mitigation fees shall be due.

As an example, for PM Peak Hour Trips above 12,315, Boeing would pay \$1,006 per new PM Peak Trip per the SW Everett Subarea Plan, or pay the current traffic mitigation fee (currently \$2,400 per new PM Peak Trip or as adjusted per inflation) if the SW Everett Subarea Plan has been retired or revised.

BACKGROUND:

The Decision of the City of Everett Imposing Mitigation Pursuant to SEPA on the Expansion of the Boeing/Everett Airplane Manufacturing Facility ("Decision Document") was issued on July 3, 1991, and revised by City Council Resolution No. 3528, September 18, 1991. Addendum No. 7 of the Decision Document, issued on February 1, 2001, required a cap of 21,000 on-site parking stalls and a cap of 35,000 on-site employees.

Boeing and the City acknowledge the need for an updated system to the Decision Document to pay for actual traffic impacts as the Boeing facility changes and grows. Implementation of this new program will better track and mitigate for the actual increase in trip generation and require payments of mitigation traffic fees if the trip generation exceeds the amount for which Boeing has already paid mitigation. It is anticipated that this system will provide a more effective way for Boeing and the City to manage traffic impacts than the current system of limitations on the amount of on-site parking spaces and employees.

Boeing has submitted the following documents related to this amendment:

- Environmental Checklist prepared on 3/23/2017
- Attachment A - Map showing Boeing Main Site and access point vehicle counting locations
- Attachment B - Final Cost Estimate for the Direct Count Program
- Attachment C - A draft traffic study titled, "*Proposed Methodology to Evaluate Boeing Driveway Counts for Determination of Mitigation Payments*," dated November 2013 by Gibson Traffic Consultants Inc.

The City has reviewed the materials above and has accepted the general methodology.

THE AGREEMENT:

A final agreement will be signed by the City of Everett and Boeing. The draft agreement is shown as Exhibit 1 attached to this proposed decision document.

CONSISTENCY WITH MODIFICATION CRITERIA IN BOEING MASTER DEVELOPMENT PLAN

Article VIII.E of the Decision Document addresses modifications to the Boeing Master Development Plan. In order for the City to determine whether a proposed change is minor or major, the plan contains three review criteria. This section states:

A change shall be considered to be major when one or more of the following is found:

1. *The change is in substantial conflict with a condition imposed in this Decision Document, such as major modification of an on-site TDM provision, or reduction of required wetland protection;*

Finding: The change would implement a new way to mitigate for traffic impacts. Implementing the Direct Count Program would track the actual PM Peak Hour Trips Boeing is generating regardless of employee count or on-site parking. Boeing will be required to mitigate for traffic increases beyond what they have already paid mitigation. The number of employees at any given moment is difficult to track and an increase in employee levels may or may not impact the amount of vehicular traffic that is generated, especially as current or new transportation options are developed and improved in the future. Changing the methodology to counting actual traffic to the site will ensure that Boeing will mitigate for actual trip generation.

Any new parking lot construction on the Boeing property will require a review for consideration of impacts on surface water, critical areas and land use. No new parking lot construction is proposed at this time.

2. *The change will substantially and negatively affect an adjoining property in a manner not addressed in the EIS and this document.*

Finding: By implementing the Direct Count Program, traffic will be counted on a continuous basis with quarterly reporting, and if PM peak hour trips go over the baseline, traffic mitigation fees will be due. The change should not substantially or negatively affect an adjoining property, as increases in traffic to the Boeing site will be mitigated by traffic mitigation fees.

3. *The change will result in a major increase in offsite impacts, such as traffic or noise, not analyzed, where appropriate, and mitigated in this review process.*

Finding: The proposed change is not project specific and it will not generate additional traffic, noise or other impacts that have not already been analyzed in the 1991 EIS.

Conclusion: The proposed modifications to the Mitigation Decision Document are minor for the reasons stated above. The changes:

- Are not in substantial conflict with any conditions in the Decision Document;
- Will not substantially and negatively affect an adjoining property; and
- Will not result in a major increase in offsite impacts.

Mitigation Measures: The environmental impacts of this proposal are documented in the Environmental Checklist and other information on file with the City. The listed requirements are placed in response to our review of this information:

MITIGATION OF ADVERSE IMPACTS BY SEPA:

1. The Applicant shall participate in the signed agreement with the City in the establishment and operation of the "direct count" traffic counting program. Please refer to the Agreement in Exhibit 1 and Attachment C, *"Proposed Methodology to Evaluate Boeing"*

Driveway Counts for Determining Mitigation Payment. (SEPA Earth, Land and Shoreline Use Policies).

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An Environmental Impact Statement is not required under RCW 43.21C.030(2)(c). This determination assumes compliance with State law and City ordinances related to general environmental protection including but not limited to right-of-way improvement requirements, drainage, etc. This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request. This Addendum is specifically conditioned on compliance with the conditions attached hereto which are incorporated by reference as if fully set forth herein.

This Addendum is issued under 197-11-625. The City as the lead agency has determined that significant adverse environmental impacts are unlikely; however, additional conditions are necessary in order to avoid potential future impacts. Because of the need for additional conditions, a public comment period is required.

Comments must be submitted by **December 4, 2017** or fourteen (14) days after the date shown on the notarized copy of the notice of posting, whichever date is later.

Responsible

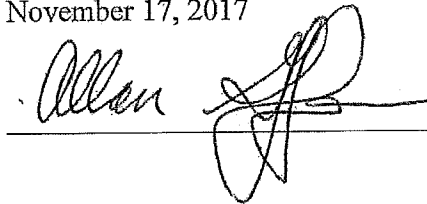
Official: Allan Giffen, Director Phone: (425) 257-8731

Title: Planning and Community Development Responsible Official

Address: 2930 Wetmore Avenue, Suite 8-A, Everett, WA 98201

Date: November 17, 2017

Signature:

A handwritten signature in black ink, appearing to read 'Allan Giffen', is written over a horizontal line.

You may appeal this determination by filing an appeal on forms provided by the Planning Department and a fee to the Planning/Community Development Permit Services Counter at 3200 Cedar Street, 2nd Floor, no later than 14 days from the date the Addendum becomes final (which is after the 14-day comment period).

Contact Teresa Weldon to read or ask about the procedures for SEPA appeals.

NOTE: A DNS or addendum may be withdrawn in the event of significant changes in the proposal, disclosure of new significant information, misrepresentation by the applicant, or failure to comply with the conditions upon which this SEPA Addendum is predicated.

EXHIBIT B

The site plan shows a property with various buildings and infrastructure. Key features include:

- Buildings:** Numerous buildings are labeled with numbers, including 40-01, 40-02, 40-03, 40-04, 40-05, 40-06, 40-07, 40-08, 40-09, 40-10, 40-11, 40-12, 40-13, 40-14, 40-15, 40-16, 40-17, 40-18, 40-19, 40-20, 40-21, 40-22, 40-23, 40-24, 40-25, 40-26, 40-27, 40-28, 40-29, 40-30, 40-31, 40-32, 40-33, 40-34, 40-35, 40-36, 40-37, 40-38, 40-39, 40-40, 40-41, 40-42, 40-43, 40-44, 40-45, 40-46, 40-47, 40-48, 40-49, 40-50, 40-51, 40-52, 40-53, 40-54, 40-55, 40-56, 40-57, 40-58, 40-59, 40-60, 40-61, 40-62, 40-63, 40-64, 40-65, 40-66, 40-67, 40-68, 40-69, 40-70, 40-71, 40-72, 40-73, 40-74, 40-75, 40-76, 40-77, 40-78, 40-79, 40-80, 40-81, 40-82, 40-83, 40-84, 40-85, 40-86, 40-87, 40-88, 40-89, 40-90, 40-91, 40-92, 40-93, 40-94, 40-95, 40-96, 40-97, 40-98, 40-99, 40-100.
- Parking Areas:** SURFACE PARKING and TOOL STORAGE.
- Pond:** A large pond is located in the lower right area.
- Roads:** SR 526, AIRPORT ROAD, BLVD SEAWAY.
- Numbered Locations:** Eight locations are marked with numbered circles: 1, 2, 3, 4, 5, 6, 7, and 8.

EXHIBIT C

McGuire, Peter D

From: Michael Brick <MBrick@everettwa.gov>
Sent: Friday, February 21, 2014 9:37 AM
To: McGuire, Peter D
Subject: RE: Direct Count Program

Pete,

Here's my final cost estimate for this project:

Non-Recurring Costs:

- 1) City of Everett electrical work on two additional light poles (\$0)
The cost of this work is included in Items 2 and 3 below
 - 2) Monitoring equipment (\$85,000)
It is possible that we may need as much as \$7,000 in "extra equipment" that was not originally quoted by the vendor. It is unlikely we would need this entire amount, but very likely that we will need some of it. I have increased the management reserve from \$5,000 to \$12,000 to address these possible costs.
 - 3) Equipment installation (\$5,000)
 - 4) Cellular equipment installation (\$3,000)
Cellular equipment purchase is covered in Item 2 above, but I do not have good info on how expensive support may be during initial installation. \$3,000 should cover any technical support we need from the cellular vendor.
 - 5) Software development (\$5,000)
 - 6) Management reserve (\$12,000)
Increased from \$5,000 - see Item 2 above
 - 7) Anything else?
Nothing I can think of. The management reserve amount includes all of the "maybe" costs associated with this project that I know of, and at 12% it should cover any unforeseen costs. If you want to be cautious you could make it a \$15,000 management reserve, but I really don't think we'll be using all of it.
- Total \$110,000 (increased from \$100,000 to cover potential overruns)

Recurring Costs:

- 1) Ongoing maintenance fees (\$600-\$800 per year?)
I would expect at most 1 service visit per year to check batteries, and battery replacement every 5 years @ approximately \$200 each. Other than that there is no "regular maintenance" required.
 - 2) Monthly cellular fees (approximately \$40 per month per location)
 - 3) Anything else?
No regular costs I can think of. Equipment failures would obviously add cost but the hardware is robust and I doubt we'll have a problem with that.
- Total \$5,000 per year

See you at 10.

Michael

From: McGuire, Peter D [mailto:peter.d.mcguire@boeing.com]
Sent: Thursday, February 20, 2014 12:22 PM
To: Michael Brick
Subject: RE: Direct Count Program

Okay, thanks.

EXHIBIT D

DRAFT

Proposed Methodology to Evaluate Boeing Driveway
Counts for Determination of Mitigation Payments

Gibson Traffic Consultants, Inc.

November 2013

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Executive Summary

The City of Everett and The Boeing Company have preliminarily agreed on a permanent traffic counting system to continuously measure the inbound and outbound vehicle trips at all of the Boeing driveways at their Paine Field facilities in Everett. This would accurately determine the Boeing PM peak hour and measure Boeing peak hour volumes. These data could then be compared with the “baseline” peak hour and peak hour trips as identified and mitigated for in the 1991 Boeing Expansion FEIS. This new “empirical” calculation of Boeing traffic volumes would be used by the City of Everett to ensure Boeing is not charged for trips during redevelopment that may have already been mitigated for and assure compliance with the City of Everett’s 1996 SW Everett/Paine Field Subarea Planned Action.

The research and analysis resulted in the following findings and recommendations.

- The adverse transportation impacts identified in the 1991 EIS (DEIS and FEIS) were based on traffic analysis for two distinct PM peak hours, the Boeing PM peak hour from 2:30 to 3:30 PM and the “System Peak” from 4:30 to 5:30 PM.
- The highest total forecast inbound plus outbound Boeing PM peak hour volume, occurring during the 2:30 to 3:30 PM Boeing peak hour, was 12,315 trips. This peak hour time and volume was the “baseline” for the Boeing Expansion approval, and upon which Boeing’s traffic mitigation payments were set.
- Preliminary data from the Boeing Company suggests that the current Boeing PM peak hour occurs earlier than 2:30 to 3:30 and is less than 12,315 peak hour trips identified in the approvals.
- This would be consistent with the review of existing volumes and capacities in the SW Everett/Paine Field subarea in 2012.
- A direct count program observing all site access driveways to the Boeing facility would be required to confirm the draft determination that Boeing is generating no more than the PM peak hour traffic than was originally mitigated for in the 1991 FEIS documentation. This potentially allows site employment growth above the existing employment cap without triggering additional traffic mitigation.
- Confirmation of the Boeing PM peak hour time and peak hour volumes will require the successful implementation of the permanent direct count program, and ongoing review of the capacities and volumes on the streets, roads and highways serving the SW Everett/Paine Field Subarea.

Recommendations for the Boeing Direct Count Program that will be used to calculate the current Boeing PM Peak Hour and the Observed Annual Average Boeing Driveway Volume:

- Calculating an average for all weekdays, including holidays,
- Using a measurement period of one year,
- Focusing on the PM period from 1:00 PM to 6:00 PM,

- Using consistent, predetermined methodologies for converting the data stream from the permanent traffic counters into determinations of the Boeing PM Peak Hour and the Observed Annual Average Boeing Driveway Volume during that hour.

Proposed Methodology to Evaluate Boeing Driveway Counts for Determination of Mitigation Payments

Goal

The goal is to assess Boeing PM peak hour traffic volumes based on direct traffic vehicle counts for compliance with approved volumes. This document outlines the methodology for converting the output from electronic traffic counters into valid estimates of average PM peak hour traffic generated by Boeing on weekdays. This will help the City of Everett to establish and implement a valid program of traffic monitoring for future Boeing expansions. Should future Boeing PM peak hour traffic volumes exceed existing approvals this would also provide a framework for mitigating those potential impacts.

Objectives

Both principal parties, the City of Everett and Boeing, need to have confidence in the methodology and the reported volumes. The City needs to have confidence that if Boeing increases traffic, that the methodology will capture that increase. If Boeing is going to pay the City for future increases, then it should be confident that the increases are real and not temporary aberrations.

Permanent Boeing Direct Count System

The planned permanent counting equipment will be installed in a joint operation between Boeing and the City of Everett. Generally, Boeing will provide power to either a new or an existing pole where traffic counting equipment will be mounted. The City will install permanent, non-invasive radar-based counting equipment such as Wavetronix units on the poles. These will be installed at all locations where employee and vendor traffic can enter or exit from Boeing property on a driveway in City of Everett jurisdiction, forming a cordon around the Boeing campus.

Definition of Terms

The *Boeing PM Peak Hour* is the contiguous one-hour weekday PM period between 1:00 to 6:00 PM in which the highest Boeing traffic volumes occur (See Attachment 2).

The *Observed Annual Average Boeing Driveway Volume* is the average number of vehicles entering and leaving Boeing facilities in the Paine Field area in the Boeing PM peak hour, Monday through Friday, including holidays, for each one-year measurement period.

Count Equipment consists of the actual traffic counting devices as well as the related data monitoring and analysis software suite installed at Boeing driveways in the City of Everett.

Driveway Count Data are the outputs from the count equipment showing the number of vehicles entering and leaving all Boeing driveways in 15 minute intervals.

Annual Measurement Period is the agreed-upon duration for each set of driveway data points. Each measurement period will be one year in duration, commencing on the date that the permanent Boeing traffic counting system is deemed operational by the City of Everett.

The *Boeing 1991 Baseline PM Peak Hour Traffic Volume* is the number of PM peak hour trips that Boeing mitigated pursuant to the City of Everett's 1991 Decision Document which permitted the expansion of Boeing's facilities at Paine Field to build the Boeing 777 aircraft. (See section titled "Confirming the Baseline Amount of 12,315 PM Peak Hour Trips" and Attachment 1).

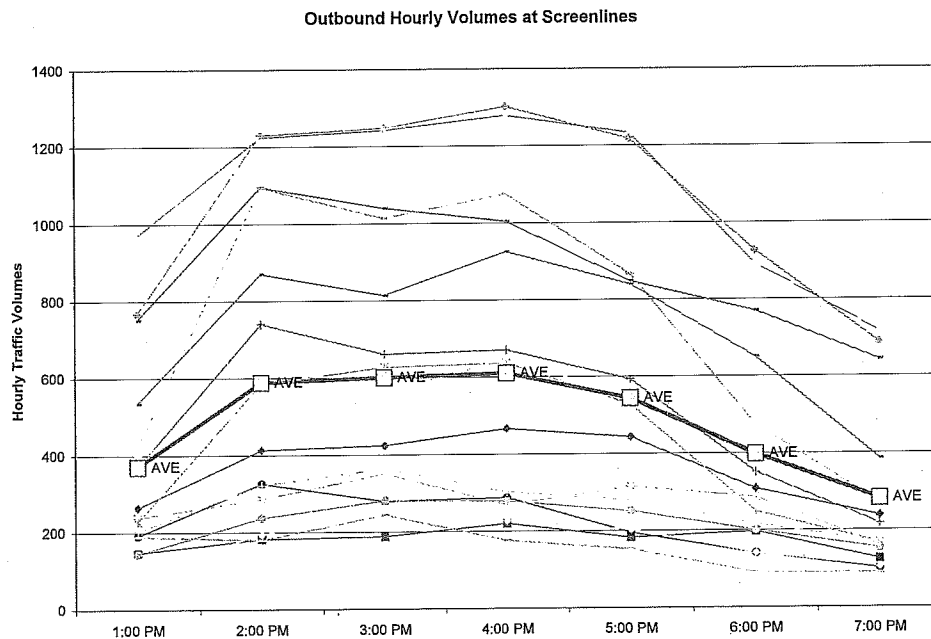
The *Boeing Current Baseline PM Peak Hour Traffic Volume* is the number of PM peak hour trips that Boeing has already mitigated. Initially this is equal to the Boeing 1991 Baseline PM Peak Hour Traffic Volume (above) but will be raised if the Observed Annual Average Boeing Driveway Volume exceeds this volume and appropriate mitigation fees are paid.

Roadway System Peak Period

Recent traffic counts at the screenline locations around the Paine Field subarea show that there is a three-hour period from 2:00 PM until 5:00 PM in which traffic volumes peak. Figure 1 shows the outbound hourly volumes at the screenlines, showing a fairly distinct three-hour system peak period. The biggest effect of Boeing traffic on the overall system will most likely be during this three-hour period. In measuring the Boeing traffic volumes, however, it will also be important to confirm the "shoulder" on either side of the peak period. Thus, in calculating the current Boeing PM Peak Hour Traffic Volume it will be important to include the total five-hour period from 1:00 PM to 6:00 PM.

Purchase, Installation, Operation and Maintenance of Count Equipment

Boeing will reimburse the City of Everett for the cost of the counter units, plus one spare count station system, as well as the related data monitoring and analysis software suite. Boeing will also reimburse the City of Everett for the cost of a complete wireless telemetry system which will allow real-time data reporting and system health monitoring, including the required communications hardware and antenna. The City of Everett will install, monitor, operate and maintain the entire system. Boeing will also have real-time access to the traffic counter data to enable active management of their traffic volumes.

Figure 1 – Outbound Hourly Volumes at Screenlines

Boeing will reimburse the City of Everett for the construction/installation costs including materials and labor. Typical maintenance labor costs will be borne by the City of Everett. Boeing will be responsible to reimburse data transmission charges and will supply system power. Boeing will also be responsible to replace any poles that are damaged or destroyed, as well as pay to replace any count equipment that has reached the end of their service life, are damaged or destroyed due to accidents or Acts of God.

Baseline for Assessing Mitigation

In 1991 Boeing was assessed 47.46 million dollars through SEPA to mitigate adverse impacts on the Paine Field area transportation system for the increases in employment associated with production of the 777 aircraft. As discussed above, the City and Boeing have agreed to use driveway counts at Boeing's Paine Field facilities to assess Boeing traffic volumes. Under this agreement Boeing would be assessed additional mitigation payments only if the total number of PM peak hour trips generated by its Paine Field facilities exceeded the number already mitigated by Boeing.

Baseline assessment includes the following:

- The initial Boeing Current Baseline PM Peak Hour Traffic Volume is equal to the Boeing 1991 Baseline PM Peak Hour Traffic Volume of 12,315 PM peak hour trips.
- For each subsequent year, if the Observed Annual Average Boeing Driveway Volume for the current year is lower than the Boeing Current Baseline PM Peak

Hour Traffic Volume, then no additional mitigation payment would be required, and the baseline would remain unchanged.

- If the Observed Annual Average Boeing Driveway Volume for the current year is higher than the Boeing Current Baseline PM Peak Hour Traffic Volume, then Boeing would make additional mitigation payments of \$1,006 for each PM peak hour trip that exceeded the baseline. This would also increase the Boeing Current Baseline PM Peak Hour Traffic Volume for future years to the level of the Observed Annual Average Boeing Driveway Volume for the current year.

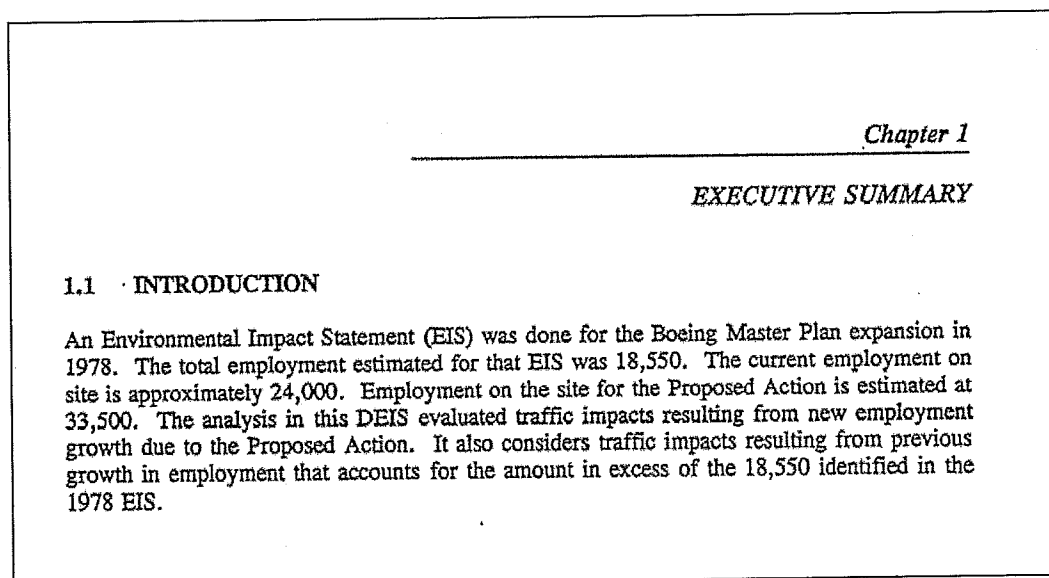
Example:

In the current year the Observed Annual Average Boeing Driveway Volume was 11,000 PM peak hour trips. Since this is less than the baseline of 12,315, no additional mitigation would be required. If next year the Observed Annual Average Boeing Driveway Volume was 12,500 then Boeing would be required to mitigate the increase of 185 trips above the baseline ($12,500 - 12,315 = 185$). The amount of mitigation would be \$1,006 times 185 which equals \$186,110. The Boeing Current Baseline PM Peak Hour Traffic Volume would then be 12,500 PM peak hour trips.

Confirming the Initial Baseline

The following provides excerpts from the 1991 DEIS, 1991 FEIS and the City of Everett SEPA decision document which confirm that 12,315 is the correct amount for the 1991 Boeing Baseline PM Peak Hour Volume.

Figure 2 shows an excerpt from the first page of the 1991 DEIS Executive Summary and provides the key employment levels assumed in the determination of the impacts of the Boeing expansion in 1991. Specifically these levels are 18,550 (employment level assumed in Boeing's previous approval in 1978) and 33,500 (maximum employment level assumed for approved expansion). These employment levels were important for determining the total new PM peak hour trips generated which was the basis for the determination of the mitigation amount. In 2001 Addendum #7 raised the maximum site employment level to 35,000 but no additional traffic analysis was conducted and no additional mitigation was provided at that time.

Figure 2 – DEIS Section 1.1

DEIS Section 1.41 shown in Figure 3 states that the Proposed Action would add 9,500 workers. The Proposed Action is the expansion to 33,500 employees upon which the analysis was based, the approval by the City was granted, and the mitigation of \$47.46M was assessed. The 9,500 amount cited in Figure 3 is derived by subtracting the assumed 1989 employment level (24,000) from the assumed maximum 1995 employment level for the Proposed Action (33,500).

DEIS Section 1.42 shown in Figure 3 indicates that the Proposed Action would increase the Boeing PM peak hour traffic volume to 12,300 trips. This is the same amount (rounded off) as the 12,315 amount found in Table 11 of Section 4.2.2 of Boeing's 1991 EIS.

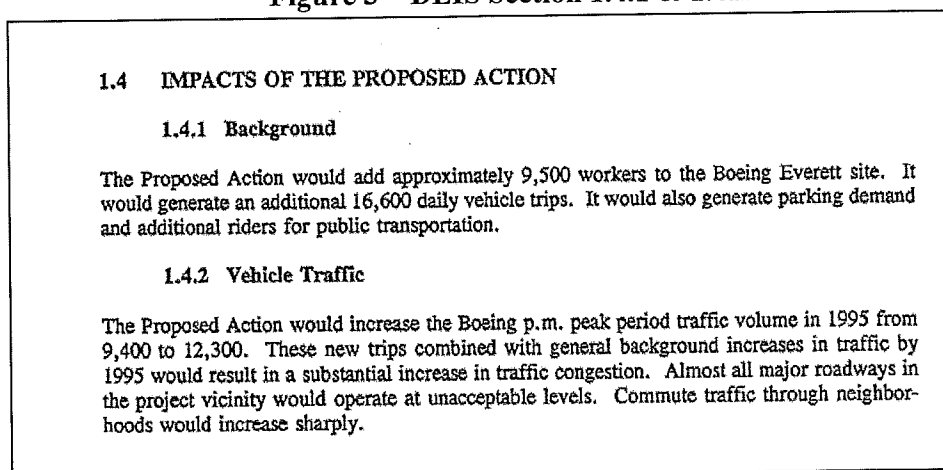
Figure 3 – DEIS Section 1.4.1 & 1.4.2

Figure 4 provides a snapshot of Table 11. The table shows that for the 1995 Proposed Action with 33,500 employees, the PM peak hour trips would be 2,700 inbound and 9,615 outbound, which added together results in 12,315 total PM peak hour trips.

Figure 4 – DEIS Section 4.2.2 & Table 11

4.2.2 Traffic Volumes				
Trip generation rates are assumed to follow current patterns. Because of the increase in site employment, there would be a substantial increase in the trips generated, as shown in <i>Table 11</i> . Note that because of a decrease in employment in the year 2000, there could be a slight decrease in trip generation as compared to 1995.				
Table 11 TRIP GENERATION - PROPOSED ACTION - BOEING PEAK				
	Number of Employees	Number of Trips (inbound/outbound)		
		AM Peak	PM Peak	Daily
1978 EIS	18,550	4,510/560	1,490/5,325	36,830
1989 Peak Employment	25,660	6,235/775	2,065/7,365	50,950
1995 Proposed Action	33,500	8,150/1,010	2,700/9,615	66,575
2000 Proposed Action	32,000	7,780/960	2,575/9,185	63,595

Note also that Section 1.4.2 shown in Figure 3 above cites 9,400 current trips which is a rounding of the 9,430 calculated for 1989 peak employment from Table 11 (2,065 + 7,365 = 9,430).

Figure 5 provides a simplification of the key PM peak hour trip numbers with totals shown.

Figure 5 – Summary of PM Peak Hour Trips from Existing Environmental Reviews

PM Peak-Hour Trips (PHT)				
	Number of Employees	PM PHT Inbound	PM PHT Outbound	PM PHT Total
1978 EIS	18,850	1,490	5,325	6,815
1989 Peak Employment	25,660	2,065	7,365	9,430
1995 Proposed Action	33,500	2,700	9,615	12,315
2000 Proposed Action	32,000	2,575	9,185	11,760

Though the 2000 Proposed Action with employment of 32,000 is shown in Table 11, for the purpose of analysis 33,500 was used.

Figure 6 – DEIS Attachment M Transportation Facts and Assumptions

- Total Boeing Everett employment in late 1989 was 25,660. This figure was used in analysis because it represented the most comprehensive employment data available at the time this study was undertaken. Other studies supporting this report used 24,000 as the existing site employment. The total employment estimate for the 1978 Master Plan was assumed to be 18,550.
- Maximum employment under the Proposed Action was assumed to be 33,500 in 1995. The project description assumes that the population would decrease to 32,000 in 1996 through 2000. However, for the purposes of analysis, the 33,500 is assumed to be constant.

On July 3, 1991 the City of Everett issued its Decision Document stating that the “adverse environmental impacts which this Document addresses were identified in the DEIS on the Boeing proposal issued on April 15, 1991, as updated, expanded and clarified in the FEIS issued on June 24, 1991.” It further states that these impacts did not warrant denial of the proposal, but “did provide the basis for the mitigating measures” set forth in the Decision Document. Figure 7 shows a snapshot of the first paragraph of the Decision Document with these statements.

Figure 7 – City of Everett Decision Document - 1st Paragraph

**THE DECISION OF THE CITY OF EVERETT
Imposing Mitigation Pursuant to SEPA
on the Expansion of the
Boeing/Everett Airplane Manufacturing Facility**

I. DECISION ISSUED RESPONSIVE TO SEPA REQUIREMENTS

This Decision Document has been prepared and is issued by the City of Everett's Director of Planning and Community Development who is identified under Everett Ordinance 1348-87 as the Responsible Official designated to exercise the City's substantive SEPA authority. This Document has been prepared responsive to the requirements of RCW 43.21C.060, WAC 197-11-660, and Everett Ordinance 1348-87. The adverse environmental impacts which this Document addresses were identified in the DEIS on the Boeing proposal issued on April 15, 1991, as updated, expanded and clarified in the FEIS issued on June 24, 1991. These impacts, in the judgment of the Responsible Official, did not warrant denial of the proposal under WAC 197-11-660(2) but did provide the basis for the mitigating measures set forth in Sections V through VII.

The FEIS issued on 6/24/1991 resulted in no changes to the estimate of 12,315 new PM peak hour trips expected to be generated by the Proposed Action. A snapshot of Table 3.10-1 is shown in Figure 8. It shows for the Proposed Action 2,700 inbound and 9,615 outbound PM peak hour trips which added together is 12,315.

Figure 8 – FEIS Table 3.10-1

Table 3.10-1 Trip Generation - Boeing Peak (Proposed Action)				
	Number of Employees	Number of Trips (inbound/outbound)		
		AM Peak	PM Peak	Daily
1978 EIS Projected	18,550	4,510/560	1,490/5,325	36,830
1995 Proposed Action	33,500	8,150/1,010	2,700/9,615	66,575

3-68

The FEIS also clarifies the possible confusion over the “current” employment levels (24,000 or 25,660?). Figure 9 provides a snapshot of an “errata” in the Transportation section of the FEIS which amends Table 11 of the DEIS to show 24,000 as the current level.

Figure 9 – FEIS Errata amending DEIS Table 11 (Figure 4 Above)

64	Table 11	Second row. Replace "1989 Peak Employment" with "Current Employment." Across from this, in the column labeled "Number of Employees," change 25,660 to 24,000.
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Conclusion on Baseline

The Decision Document indicates that the adverse environmental impacts were identified in the 1991 DEIS and FEIS. The 1991 DEIS indicates that the total number of PM peak hour trips upon which the transportation analysis for the proposed action was based was 12,315. The June 24, 1991 FEIS reiterated this amount. The Decision Document implicitly approved the proposal on the basis of mitigating the adverse impacts (i.e., the 12,315 trips). Boeing was assessed \$47.46 million dollars to mitigate traffic impacts, expanded its facilities at Paine Field, and went into production of the Boeing 777 aircraft. Any future expansions will be evaluated against the baseline of 12,315 PM peak hour trips. Preliminary evidence from Boeing (see Attachment 1) suggests that the Current Boeing PM Peak Hour Volumes are less than 12,315. However, this cannot be confirmed until a permanent driveway counting system has been operational and the first one-year measurement period has been completed.

Note that the analysis and approval were based on the timing of the Boeing PM Peak Hour from 2:30 to 3:30 PM (see Attachment 2). Preliminary evidence from analysis by Boeing (also see Attachment 1), suggests that the Current Boeing PM Peak Hour is

occurring earlier than the 2:30 to 3:30 Boeing PM Peak Hour determined in 1991. Once again, this cannot be confirmed until the first results have been tabulated for the permanent counting system.

If the results of the permanent driveway counting system are consistent with Boeing's preliminary review (Attachment 1) they would be consistent with findings of a 2012 review of traffic volumes and capacities at 19 screenline locations in the SW Everett/Paine Field Subarea. This review found lower PM peak hour volumes than forecast in 1996 (see summary in the next section in this report).

Accordingly, Boeing may be able to expand employment at its Paine Field facilities without exceeding the 12,315 trip baseline, provided that the Boeing PM Peak Hour does not shift later than 2:30 to 3:30 PM. If we assume that Boeing is currently at its 2001 approved maximum employment level of 35,000 and based on the preliminary Boeing data of 9,570 Boeing peak trips, the Boeing facilities could potentially add over 9,400 employees if the City monitoring system is consistent with the preliminary Boeing counts and within the SW Paine Field FEIS monitoring levels¹.

1996 Planned Action Traffic Volumes and Capacities Review

In 1996, the City of Everett completed a Planned Action for the SW Everett/Paine Field Subarea. The transportation analysis used in the environmental documents (EIS) for this Planned Action demonstrated that by 2030 the subarea, with certain transportation improvements, could accommodate increased traffic volumes associated with Subarea employment level growth to 83,000 employees.

The transportation methodology was based on a subarea cordon with 19 screenline locations. Three alternative levels of employment growth were used to forecast daily trip volumes and impacts for 2015 and 2030. The daily volumes at screenline locations were converted to peak hour, peak direction volumes using standard traffic engineering assumptions. These peak hour, peak direction volumes were compared to the roadway capacities at each of the screenlines to compute volume to capacity ratios (V/C).

The volumes and capacities for the 19 screenline locations were aggregated to compute an overall cordon PM peak hour V/C ratio. The approved EIS transportation analysis forecast that the overall cordon V/C ratio would be 1.0 in 2030 with the recommended high growth alternative of 83,000 employees and with the construction of a set of capacity improvements (paid for with a combination of mitigation fees, grants and city funds) to the road system.

In 2012 a review of the current capacities and traffic volumes at the 19 screenline locations in the cordon was conducted. The analysis found that current daily volumes for

¹ If 33,500 employees generate 9,570 peak hour trips, the rate is about 0.29 trips per employee during the Boeing PM Peak Hour. Potentially Boeing could add another 2,745 peak hour trips before reaching the baseline of 12,315. At 0.29 trips per employee, it would take another 9,466 employees to reach the 12,315 total.

the screenlines match the 2015 medium-growth forecast almost exactly. An estimate of current employment for the Subarea is also consistent with the 2015 medium-growth forecast.

However, even though daily volumes have increased as expected, the peak hour, peak direction volumes have increased significantly less than forecast. This result is caused by a much greater spreading of the PM peak period than forecast. In addition, the directional splits were more even than forecast and the amount of mode shift is slightly more than forecast. All of these factors mean significantly higher employment growth can be achieved before exceeding the approved 1.0 V/C ratio for the critical PM peak hour. These results can help inform decisions on possible future increases in employment levels in the Planned Action Area.

Based on the 1996 approved assumptions and the 2012 traffic analysis, some revised employment/trip projections can be made for 2030. They show that:

- With the existing levels of peak spreading, mode share and directional split, an aggregated cordon peak hour V/C ratio just less than 1.0 could be achieved with a Subarea employment level of 88,000 (5,000 employees more than the 2030 High growth alternative).
- With a level of mode shift consistent with the regional travel demand model, a V/C just less than 1.0 could be achieved with 93,000 employees (10,000 employees more than the adopted 2030 High growth alternative).
- With additional outbound travel lanes on the two most congested screenline locations (SR 526 and Glenwood Ave.) or similar capacity improvements, a V/C of less than 1.0 could be achieved with 98,000 employees, an increase of 15,000 over the High growth alternative.

The most conservative analysis appears to allow for an additional 5,000 employees in the Subarea above the approved high growth forecast. These additional 5,000 employees could be allocated to developments on a first-come, first-serve basis, provided that the trip-production thresholds identified in the 1996 EIS are not exceeded. These thresholds could require additional analysis and/or mitigation from any development with more than 50 employees per developable acre or that generates more than 25 new PM peak hour trips per developable acre.

Allocation to the Subarea of between 5,000 and 10,000 additional employees would require a slight mode shift consistent with the regional model forecasts. Though the amount of shift required is consistent with existing travel trends and forecasts, there would need to be monitoring to demonstrate that the modal shift and travel patterns are consistent with the forecasts to allow 5,000 to 10,000 additional employees in the Subarea. This monitoring would consist of new traffic counts at all of the screenline locations and review of V/C ratios at least every two years.

Allocation to the Subarea of between 10,000 and 15,000 additional employees would require the construction of transportation improvements to increase the capacity at the screenlines. The construction of additional capacity on SR 526 would probably provide the best accommodation for significant employment increases (up to 15,000) in the SW Everett/Paine Field Subarea.



**FINAL
ADDENDUM NO. 19 TO THE
1991 BOEING EVERETT MITIGATION
DECISION DOCUMENT
SEPA #17-009**

APPLICANT: The Boeing Company
Attn: Todd Haberlack
P.O. Box 3707 MS: OH-13
Seattle, WA 98124-2207

PROJECT LOCATION: 3003 W Casino Rd.
Everett, WA 98204

Lead Agency: Community, Planning and Economic Development

City Contact: Teresa Weldon Phone: (425) 257-8731

DESCRIPTION OF THE PROPOSED ACTION:

The proposed action is an amendment to the Decision Document to eliminate the cap of 21,000 on-site parking stalls and the cap of 35,000 employees at the Everett Boeing main site in exchange for the implementation of a direct vehicle traffic counting system called the "Direct Count Program". The City of Everett and Boeing will jointly participate in this program to provide direct counting of vehicle traffic at all entrances to Everett Boeing's Main Site and Flightline.

The data generated will be compared with baseline data from the 1991 Master Plan EIS to evaluate actual trip generation. To date, Boeing has paid for 12,315 PM Hour Peak Trips. For each new PM Peak Hour Trip above the approved baseline traffic volume, Boeing shall pay a traffic mitigation fee calculated in accordance with the traffic mitigation ordinance in effect for the Boeing Everett site at the time of calculation. Upon payment of this traffic mitigation fee, a new baseline traffic volume shall be set equal to the sum of the old baseline traffic volume and the newly mitigation PM Peak Hour Trips. By implementation of this program, the future observed annual traffic counts will be the determining factor in whether traffic mitigation fees shall be due.

As an example, for PM Peak Hour Trips above 12,315, Boeing would pay \$1,006 per new PM Peak Trip per the SW Everett Subarea Plan, or pay the current traffic mitigation fee (currently \$2,400 per new PM Peak Trip or as adjusted per inflation) if the SW Everett Subarea Plan has been retired or revised.

BACKGROUND:

The Decision of the City of Everett Imposing Mitigation Pursuant to SEPA on the Expansion of the Boeing/Everett Airplane Manufacturing Facility ("Decision Document") was issued on July 3, 1991, and revised by City Council Resolution No. 3528, September 18, 1991. Addendum No. 7 of the Decision Document, issued on February 1, 2001, required a cap of 21,000 on-site parking stalls and a cap of 35,000 on-site employees.

Boeing and the City acknowledge the need for an updated system to the Decision Document to pay for actual traffic impacts as the Boeing facility changes and grows. Implementation of this new program will better track and mitigate for the actual increase in trip generation and require payments of mitigation traffic fees if the trip generation exceeds the amount for which Boeing has already paid mitigation. It is anticipated that this system will provide a more effective way for Boeing and the City to manage traffic impacts than the current system of limitations on the amount of on-site parking spaces and employees.

Boeing has submitted the following documents related to this amendment:

- Environmental Checklist prepared on 3/23/2017
- Attachment A - Map showing Boeing Main Site and access point vehicle counting locations
- Attachment B - Final Cost Estimate for the Direct Count Program
- Attachment C - A draft traffic study titled, "*Proposed Methodology to Evaluate Boeing Driveway Counts for Determination of Mitigation Payments*," dated November 2013 by Gibson Traffic Consultants Inc.

The City has reviewed the materials above and has accepted the general methodology.

THE AGREEMENT:

An agreement has been signed by the City of Everett and Boeing. The agreement titled, "*Direct Count Program Agreement*" is attached to this decision document.

CONSISTENCY WITH MODIFICATION CRITERIA IN BOEING MASTER DEVELOPMENT PLAN

Article VIII.E of the Decision Document addresses modifications to the Boeing Master Development Plan. In order for the City to determine whether a proposed change is minor or major, the plan contains three review criteria. This section states:

A change shall be considered to be major when one or more of the following is found:

1. *The change is in substantial conflict with a condition imposed in this Decision Document, such as major modification of an on-site TDM provision, or reduction of required wetland protection;*

Finding: The change would implement a new way to mitigate for traffic impacts. Implementing the Direct Count Program would track the actual PM Peak Hour Trips Boeing is generating regardless of employee count or on-site parking. Boeing will be required to mitigate for traffic increases beyond what they have already paid mitigation. The number of employees at any given moment is difficult to track and an increase in employee levels may or may not impact the amount of vehicular traffic that is generated, especially as current or new transportation options are developed and improved in the future. Changing the methodology to counting actual traffic to the site will ensure that Boeing will mitigate for actual trip generation.

Any new parking lot construction on the Boeing property will require a review for consideration of impacts on surface water, critical areas and land use. No new parking lot construction is proposed at this time.

2. *The change will substantially and negatively affect an adjoining property in a manner not addressed in the EIS and this document.*

Finding: By implementing the Direct Count Program, traffic will be counted on a continuous basis with quarterly reporting, and if PM peak hour trips go over the baseline, traffic mitigation fees will be due. The change should not substantially or negatively affect an adjoining property, as increases in traffic to the Boeing site will be mitigated by traffic mitigation fees.

3. *The change will result in a major increase in offsite impacts, such as traffic or noise, not analyzed, where appropriate, and mitigated in this review process.*

Finding: The proposed change is not project specific and it will not generate additional traffic, noise or other impacts that have not already been analyzed in the 1991 EIS.

Conclusion: The proposed modifications to the Mitigation Decision Document are minor for the reasons stated above. The changes:

- Are not in substantial conflict with any conditions in the Decision Document;
- Will not substantially and negatively affect an adjoining property; and
- Will not result in a major increase in offsite impacts.

MITIGATION MEASURES: The environmental impacts of this proposal are documented in the Environmental Checklist and other information on file with the City. The listed requirements are placed in response to our review of this information:

MITIGATION OF ADVERSE IMPACTS BY SEPA:

1. The Applicant shall participate in the signed agreement with the City in the establishment and operation of the "direct count" traffic counting program. Please refer to the Agreement in Exhibit 1 and Attachment C, ***"Proposed Methodology to Evaluate Boeing Driveway Counts for Determining Mitigation Payment."*** (SEPA Earth, Land and Shoreline Use Policies).

The lead agency for this proposal has determined that it does not have a probable significant adverse impact on the environment. An Environmental Impact Statement is not required under RCW 43.21C.030(2)(c). This determination assumes compliance with State law and City ordinances related to general environmental protection including but not limited to right-of-way improvement requirements, drainage, etc. This decision was made after review of a completed environmental checklist and other information on file with the lead agency. This information is available to the public on request. This Addendum is specifically conditioned on compliance with the conditions attached hereto which are incorporated by reference as if fully set forth herein.

This Addendum is issued under 197-11-625. The City as the lead agency has determined that significant adverse environmental impacts are unlikely; however, additional conditions are necessary in order to avoid potential future impacts.

The public comment period is closed. No comments were received during the comment period.

Responsible

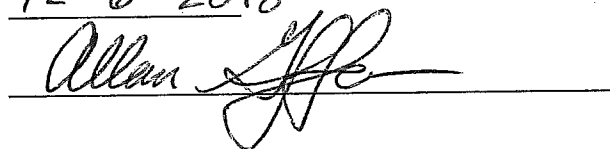
Official: Allan Giffen, Director Phone: (425) 257-8731

Title: Planning Division Responsible Official

Address: 2930 Wetmore Avenue, Suite 8-A, Everett, WA 98201

Date: 12-6-2018

Signature:



Appeal Process: You may appeal this determination by filing an appeal on forms provided by the Planning Department and a fee to the Planning/Community Development Permit Services Counter at 3200 Cedar Street, 2nd Floor, no later than 14 days from the date of this decision.

Contact Teresa Weldon to read or ask about the procedures for SEPA appeals.

NOTE: A DNS or addendum may be withdrawn in the event of significant changes in the proposal, disclosure of new significant information, misrepresentation by the applicant, or failure to comply with the conditions upon which this SEPA Addendum is predicated.